

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	WC Docket No. 03-109
Lifeline and Link UP	CC Docket No. 96-45
Federal-State Joint Board on Universal Service	WC Docket No. 12-23
Advancing Broadband Availability Through Digital Literacy Training	

EX PARTE COMMENTS OF UTAH RURAL TELECOM ASSOCIATION AND ITS MEMBERS

On December 18, 2012, the Utah Public Service Commission (“UPSC”) filed a Petition for Waiver in WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, and WC Docket No. 12-23. Specifically, the UPSC requested a waiver of the Recertification Deadline for Lifeline subscribers deadline of December 31, 2012, and a waiver of the eligible telecommunications carriers’ reporting deadline of January 31, 2013, pursuant to which the Utah wireline eligible telecommunications carriers (“ETCs”) have to complete their report to the FCC and USAC of their results of the re-certification process.

The Utah Rural Telecom Association (“URTA”), on behalf of itself and its members All West Communications, Inc., Bear Lake Communications, Carbon/Emery Telcom, Inc., Central Utah Telephone, Inc., Direct Communications Cedar Valley, Emery Telcom, Inc., Gunnison Telephone, Hanksville Telcom, Inc., Manti Telephone Company, Skyline Telecom, South Central Utah Telephone Association, Inc., UBTA-UBET Communications, Inc., and Union Telephone (“URTA members”), all of whom are wireline ETCs in Utah, hereby support the UPSC Petition for Waiver.

As indicated in the UPSC Petition Utah has a state agency that is responsible for re-certification of a subscriber’s Lifeline eligibility (the “Responsible Agency”). Therefore, under 47 CFR 54.410(f), the Responsible Agency must confirm a subscriber’s current eligibility to receive Lifeline service. Under the Public Notice Released October 11, 2012, the FCC made it clear that the recertification process for Lifeline subscribers must be completed by December 31, 2012. Accordingly, all eligible subscribers must be recertified, and all ineligible subscribers must

be de-enrolled by December 31, 2012. The Responsible Agency in Utah has not completed, and will not complete, the recertification process by December 31, 2012. Therefore, the wireline ETCs in Utah, including the URTA Members, will not be able to de-enroll ineligible subscribers by December 31, 2012 nor will they be able to submit their recertification results to the FCC and USAC by January 31, 2013.

As a result of the delay in recertification by the PSC and the Responsible Agency in Utah, the URTA Members hereby support the UPSC's Petition for Waiver of the December 31, 2012 Recertification deadline, and the January 31, 2013 ETC reporting deadline.

DATED this 20th day of December, 2012.

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